

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,** )  
                                  )  
Plaintiffs,                 )  
                                  )      **CIVIL ACTION**  
**vs.**                         )  
                                  )      **FILE NO. 1:17-cv-2989-AT**  
**BRAD RAFFENSPERGER,** )  
**ET AL.,**                    )  
                                  )  
Defendants.                 )

**COALITION PLAINTIFFS' STATEMENT  
ON WILLIAM DIGGES**

The Coalition Plaintiffs submit this Statement in response to this Court's direction in its July 2, 2019 Order:

As the Coalition Plaintiffs have indicated that Plaintiff William Digges III, who has substantial database experience, was expected to lead the Coalition Plaintiffs' review of the database, the Court DIRECTS the Coalition Plaintiffs to identify and explain in detail the nature of Mr. Digges expertise, employment, and his expected role in the review.

(Doc. 446 at 3).

**A. Mr. Digges Database Experience and Expertise**

Mr. Digges retired from IBM in 2010 after 32 years and has 25 years experience working with databases, including Microsoft Access, DB/2 and SQL. Mr. Digges has a Master of Science in Computer Information System, Regis University, and a Bachelor of Science from Fairleigh Dickenson University. His range of responsibilities for IBM, and other employment information, is described in his resume, attached hereto as Exhibit A.

**B. Mr. Digges' Knowledge of GEMS databases**

Mr. Digges also is familiar with GEMS databases. Mr. Digges has reviewed the structure and operation of the 2001 and 2002 GEMS databases from Hall County and Cobb County, Georgia. These databases are in the public domain.<sup>1</sup> He has also reviewed GEMS databases in the public domain including large post-election databases from Pima County, Arizona, and Marin County, California, which have the same file layout as the referenced Georgia's Hall County and Cobb County databases.

**C. Mr. Digges' Anticipated Role**

Mr. Digges will work with attorneys and experts in their review of non-confidential data contained in the GEMS databases and will lead the team of less-

---

<sup>1</sup> <http://blackboxvoting.org/docs/diebold/marks-gems-files.zip>

experienced analysts in their labor-intensive clerical review of the voluminous data in the databases frequently comparing that data to citizen-collected polling place documents.

The timing of Mr. Digges' involvement will depend in part upon the relief granted by this Court. Plaintiffs originally proposed that the GEMS database be produced without any confidentiality restrictions since the data is not confidential and the structure of the database is no different than the structure of other jurisdictions' databases which are already in the public record. (Doc. 441). If the Court orders the GEMS databases to be produced without restriction, Mr. Digges work will begin immediately upon receipt of the databases.

In Plaintiffs' modified proposal, set forth in its July 3, 2019 filing (Doc. 451), the GEMS databases would first be reviewed only by Plaintiffs' attorneys and experts. If the attorneys and experts identify non-confidential information that can be extracted from the databases for review by other non-lawyer, non-expert members of Plaintiffs' teams, they will identify that information to Defendants, who will have 24 hours to raise an objection. If no objection is raised, or if the objection is rejected by the Court, the Plaintiffs' attorneys or expert will provide the non-confidential information to the members of Plaintiffs' teams which, for the Coalition Plaintiffs, will be led by Mr. Digges.

Respectfully submitted this 5<sup>st</sup> day of July, 2019.

/s/ Bruce P. Brown

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
ROBERT MC GUIRE LAW FIRM  
113 Cherry St. #86685  
Seattle, Washington 98104-2205  
(253) 267-8530

*Counsel for Coalition for Good Governance*

/s/ Cary Ichter

Cary Ichter  
Georgia Bar No. 382515  
ICHTER DAVIS LLC  
3340 Peachtree Road NE  
Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600

*Counsel for William Digges III, Laura Digges, Ricardo Davis and Megan Missett*

**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ Bruce P. Brown*  
Bruce P. Brown

**CERTIFICATE OF SERVICE**

This is to certify that I have this day caused the foregoing to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 5<sup>th</sup> day of July, 2019.

*/s/ Bruce P. Brown*  
Bruce P. Brown

E

X

H

I

B

I

T

A

## William E. Digges

3478 Chastain Glen Ln NE  
Marietta, GA 30066

Cell: 678-429-3729  
wdigges@gmail.com

### SUMMARY

Financial professional with knowledge of a broad range of corporate financial operations and processes. Experienced in corporate headquarters, plant hardware or software manufacturing, and marketing environments. Business oriented expertise with financial databases and IT for analysis, process improvement, development and reporting purposes.

### PROFESSIONAL EXPERIENCE

#### **Kennesaw State University, Kennesaw, GA**

**Professional Accountant IV - (08/13 – 05/19)** – Responsible for total unit consolidated reporting and revenue, expense, financial planning and analysis for Card Services, Copy Print, ASaP Admin, Parking Services, and Student Health Services units.

**Professional Accountant IV - (01/10 – 08/13)** – Responsible for revenue, expense, financial planning and analysis for all food (9) venues on campus. Includes monthly close, actual to plan analysis statements and forecasting.

#### **IBM Corporation, Atlanta, GA**

##### **Senior Information Analyst – (2007 – 2010)**

Designed, prepared and analyzed sales leads and forecast reports for Eastern USA and Canadian regional marketing executives.

- Designed, reconciled, analyzed and distributed weekly sales forecast metrics in Excel spreadsheets to marketing, sales executives to measure sales progress.
- Used large data warehouse to provide custom opportunity analysis reports for sales executives, which assisted in improving sales metrics.
- Created custom reports for operations executives that resolved systemic record errors.

##### **Senior Business Analyst, IT – (2006 – 2007)**

Teamed with IT to develop and implement standard financial metrics reports for commission based sales representatives in a worldwide marketing environment.

Created detailed metrics reports to measure all worldwide commissioned individuals against sales quotas. Presented with the IBM Bravo Award for achievement.

- Led sales reporting standardization initiative, which consolidated commissions reporting, eliminating previous inconsistent reporting system.
- Initiated a project to improve IP data communications with a Latin American support unit that improved productivity.

##### **Senior Business Analyst – (1996 – 2007)**

Prepared and analyzed marketing revenue and gross profit report for executives using Excel in a data warehouse environment. Answered numerous inquiries from management and prepared reports as requested. Created and ran standard procedures for weekly and monthly reporting (100+ reports to 70+ Managers). Polled data warehouses for sales revenue information and consolidated the results for executive reporting.

Granted, IBM Leadership Award for overall performance.

- Mentored three employees and others in System and Database reporting techniques as required.
- Team Lead for nationwide field sales commissions reporting projects which streamlined the reporting process.
- Team Member on project for internal eBusiness initiative using a WEB based intranet portal for revenue and gross profit reporting to Sales Teams.
- Participated in a data mart server project, which provided processing efficiencies for geographic views of sales revenue using a database.

### **Senior Accountant – (1993 – 1996)**

Developed and maintained billing system for a Software & Publications unit. Created activity based cost center process for a Software & Publications unit. Distributed and controlled cost center records via inter-company network to the ledger consolidation system. A finance representative on software billing and distribution system development team, ensuring that system requirements for costing and billing were met. Duties included preparing algorithms, testing, designing SQL tables and setting up a test environment for network transactions.

### **OTHER IBM EXPERIENCE – (1977-1993)**

#### **Cost Accounting**

Controlled and calculated cost center Software unified billing rates for distribution to other inter-company units via network. Maintained and improved software cost and delivery, billing system.

#### **Staff Financial Planning – Plant Administration/Operations**

Created and measured plant facility organizations to budget for plant operations units.

#### **Systems Analyst – Property Control**

Responsible for the design, installation and maintenance of a networked asset control system which replaced a paper based system improving asset tracking.

Maintained manufacturing plant system tables for plant operating expense.

#### **International Accounting**

Finance team member executing the transfer and remote operation of a World Trade ledger operation from NY to CO. Designed and implemented the networked transfer of \$1 billion in goods and services ledger from International unit to USA domestic ledgers for efficient consolidation of worldwide accounts.

#### **Ledger and Balance Sheet Accounting**

Processed, reconciled and distributed plant ledger and balance sheet information for \$300 million manufacturing operation via an inter-company network.

#### **Division HQ Accounting**

Measured, analyzed and consolidated product development expense to budget for five plant sites to headquarters unit.

#### **Accounting, General & Administrative Expense**

Balanced and controlled manufacturing expense accounts for consolidation to headquarters unit.

### **EDUCATION**

**MS**, Computer Information Systems, Regis University, Denver, CO, 1995

Finance & Information Systems (36 Graduate credits), Pace University, White Plains, NY, 1984

**BS**, Accounting, Fairleigh Dickenson University, Teaneck, NJ, 1982

### **TECHNICAL SKILLS**

Windows 7-10, Excel, Microsoft Word, PowerPoint, Microsoft Office, Access,DB/2, QMF, SQL, BRIO, Hyperion Explorer, PeopleSoft, SAS, and advanced PC user.